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MEMORANDUM FOR: Chief, DDI Plans Staff

STATINTL FROM : [REDACTED]
 SUBJECT : Chief, Position Management & Compensation Division
 Classification Review of Proposed GS-14 EEO Position
 in DDI Administrative Staff

1. In response to your request, this memorandum outlines the rationale previously discussed with you relative to the appropriate grade allocation for subject position.

2. Our review included an evaluation of the position description submitted by DDI Admin, discussions with the Chief, DDI Admin and the DDI Executive Officer, an evaluation of applicable Classification Standards, and comparisons with similar positions within and outside the Agency. Apart from grade considerations, however, the results of our review raised questions concerning future viability of the position as a continuing full-time requirement, since it appears likely that the anticipated work load will reduce as the DDI EEO program for minorities becomes more refined with continued operation. This likelihood, coupled with the fact that the projected functions are heavily interrelated with personnel activities, suggests that consideration should be given to incorporating these EEO functions within existing O/DDI personnel positions.

3. As proposed, the position will incorporate several different types of functions related to DDI EEO activities, including: developing the DDI's Affirmative Action program, organizing interoffice EEO recruitment teams, expediting EEO personnel files, maintaining statistics on EEO status, reviewing the assignment of EEO representatives, and reviewing negative EEO results and recommending improvements. Several of these functions, such as expediting files and maintaining statistics, evaluate at the GS-11 level or below. Other functions, such as the organizing of DDI EEO recruitment teams and the reviewing of DDI EEO representative assignments would not justify an allocation above the GS-12 level.

4. The GS-13 Professional Recruitment Officers based in the Washington Area have far broader scope and responsibilities for recruitment than those included in the proposed DDI position. Their responsibilities extend beyond EEO to include recruitment responsibilities for all types of professional positions as well as representational responsibilities with the academic community and professional

organizations. In the proposed DDI EEO position, the added function of reviewing the assignment of DDI EEO representatives, (to insure that they are at an appropriate level and in a position to take positive action) is not as strong as the same responsibility exercised by the GS-13 EEO Specialists in the Office of Equal Employment Opportunity (OEEO). These Specialists are not only required to review the assignment of such representatives throughout the Agency, but to also evaluate their performance in relation to handling of EEO grievance and counseling cases.

5. The review showed that the most significant grade determining responsibilities in the position relate to developing the DDI's Affirmative Action program and monitoring its functioning by evaluating negative EEO results and recommending improvements. Such responsibilities require a knowledge of the Agency's Affirmative Action plan, the organizational structure and functions of DDI components, and an ability to liaison effectively with OEEO, OP, and DDI managers to establish and monitor the implementation of realistic objectives. However, these responsibilities are limited to the employment and development of minorities in the DDI and do not include involvement in other areas of an EEO program, such as the women's program, counseling, grievance adjudication, or contract compliance.

6. In addition to the position comparisons noted above, additional comparisons were made between the proposed position and that of the Deputy position in the Office of Equal Employment Opportunity. Although initially allocated as a GS-15 in recognition of the added planning and management responsibilities required in establishing a new Agency-wide program, the basic functions of the position were evaluated at the GS-14 level following a comprehensive survey including comparative reviews of established EEO programs and positions in 12 other Federal agencies and departments. The incumbent serves as the responsible officer for the Agency EEO complaint system, the Agency Affirmative Action plan, the Agency Blacks Program, and for training new counselors and investigators. These functions, evaluated at the GS-14 level, involve Agency-wide responsibilities and include a complex mixture of EEO program elements. The proposed DDI position, in comparison, involves responsibilities at the Directorate level concerning a limited segment of the total Directorate EEO functions.

7. Although specific classification standards have not been developed for EEO positions, a review of the Management Analyst standard provides guidance in relation to the program evaluation and recommendation functions included in the proposed position. This standard shows that a position at GS-14 level is concerned with Agency-wide assignments and programs that overlap with other Agencies, local governments, or private industry. The

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standard also shows that a position at GS-13 level is concerned with assignments and programs for a major element within an Agency that impact on a number of components within that element; even at the GS-13 level, however, such positions involve a comprehensive study of all program segments rather than study of limited segments within the program. Therefore, a review of the Management Analyst standard indicates not only a lack of justification for allocating the proposed position at the GS-14 level but also places in question the justification of an allocation at the GS-13 level, depending on the strength of the other functions incorporated in the position.

8. In summary, our review of the proposed DDI EEO position has disclosed no professional position requirements that could be evaluated above the GS-13 level.

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